

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
NEWPORT NEWS DIVISION**

<b>JOHN M. PITMAN, III, <i>et al.</i>,</b>	)	
	)	
<b>Plaintiffs,</b>	)	
	)	
<b>vs.</b>	)	<b>Civil Action No.: 4:16-cv-00179</b>
	)	
<b>XCENTRIC VENTURES, LLC, <i>et al.</i>,</b>	)	
	)	
<b>Defendants.</b>	)	
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**CONSENT MOTION FOR VOLUNTARY DISMISSAL OF CLAIMS AGAINST  
XCENTRIC VENTURES, LLC AND EDWARD MAGEDSON**

Pursuant to Rule 41(a)(2) of the Federal Rules of Civil Procedure, the Plaintiffs to this action hereby move for voluntary dismissal of their claims against Xcentric Ventures, LLC and Edward Magedson without prejudice. In support thereof, Plaintiffs state the following:

1. This is a complex litigation matter which involves multiple parties and various causes of action.
2. Given the financial risks of this litigation, the Plaintiffs, Xcentric Ventures, LLC and Edward Magedson have agreed that, if the Court enters the attached Consent Order, Xcentric Ventures, LLC and Edward Magedson consent to the voluntary dismissal of this action without prejudice.

WHEREFORE, Plaintiffs, by counsel and with the consent of Xcentric Ventures, LLC and Edward Magedson, respectfully request this Court grant this Motion for Voluntary Dismissal without prejudice, and enter the corresponding Consent Order that is attached.

Respectfully submitted,

JOHN M. PITMAN, III, and  
PENINSULA PLASTIC SURGERY  
CENTER, LTD

By: /s/ Aaron B. Houchens  
Aaron B. Houchens (VSB #80489)  
STANLEY & HOUCHENS, LLC  
13508 Booker T. Washington Highway  
Moneta, Virginia 24121  
(540) 721-6028  
(540) 721-6405 (facsimile)  
ahouchens@shg-law.com

Aaron B. Houchens, Esq. (VSB #80489)  
Seth D. Scott, Esq. (VSB#80907)  
STANLEY & HOUCHENS, LLC  
13508 Booker T. Washington Hwy.  
Moneta, Virginia 24121  
540-721-6028 (telephone)  
540-721-6405 (facsimile)  
ahouchens@shg-law.com  
sscott@shg-law.com

*Counsel for Plaintiffs John M. Pitman, III and Peninsula Plastic Surgery Center, LTD.*

**CERTIFICATE OF SERVICE**

I hereby certify that on September 29 2017, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

David A. Warrington, Esq.  
LeClair Ryan  
2318 Mill Road, Suite 1100  
Alexandria, Virginia 22314  
Phone: (703) 647-5926  
Fax: (703) 647-5966  
david.warrington@leclairryan.com

*Counsel for Defendant Xcentric Ventures, LLC and Edward Magedson*

Jesse R. Binnall, Esq.  
Louise T. Gitcheva, Esq.  
717 King Street, Suite 300  
Alexandria, Virginia 22314  
Phone: (703) 888-1930  
jbinnall@harveybinnall.com  
lgitcheva@harveybinnall.com

*Counsel for Defendants Anna Richter, Bert Pitman, and Tracey Richter*

/s/ Aaron B. Houchens  
Aaron B. Houchens (VSB #80489)  
STANLEY & HOUCHENS, LLC  
13508 Booker T. Washington Highway  
Moneta, Virginia 24121  
(540) 721-6028  
(540) 721-6405 (facsimile)  
ahouchens@shg-law.com